

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

JANE DOE #1 and JANE DOE #2 on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

MG FREESITES, LTD, d/b/a  
“Pornhub”; MG FREESITES II, LTD;  
MINDGEEK S.A.R.L.; MINDGEEK  
USA INCORPORATED; MG CY  
HOLDINGS LTD; MINDGEEK  
CONTENT RT LIMITED; 9219-1568  
QUEBEC, INC., d/b/a MINDGEEK;  
MG BILLING LTD,

Defendants.

Case No. 7:21-cv-00220

**UNOPPOSED**

**DEFENDANTS’ UNOPPOSED MOTION TO FILE DEFENDANTS’  
MOTION TO STAY UNDER SEAL**

Defendants MindGeek S.A.R.L., MG Freesites Ltd, MG Freesites II Ltd, MindGeek USA Inc., MG CY Holdings Ltd, MindGeek Content RT Ltd., 9219-1568 Quebec Inc., and MG Billing Ltd (collectively, “Defendants”), with the assent of counsel for Plaintiffs, respectfully move this Court to allow Defendants to file their Motion to Stay under seal. In support of their motion, Defendants state as follows:

1. Defendants understand there is an ongoing criminal proceeding in which Plaintiff Jane Doe #1 is a victim. Plaintiffs’ counsel has confirmed Defendants’ understanding.

2. During the Court’s Status Conference on March 2, 2022, Defendants raised the issue of this ongoing criminal matter, and stated that this action should

therefore be stayed pending resolution of the criminal proceeding pursuant to the Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. § 1595(b)(2).

3. During the Status Conference, Defendants represented that they would be preparing and filing a motion to stay in this matter pursuant to the mandatory stay provision of the TVPRA. The parties and the Court agreed that any motion would necessarily contain information regarding the underlying criminal case, the identity of Jane Doe 1’s alleged trafficker(s), and identifying and sensitive information regarding Jane Doe 1. Accordingly, Defendants agreed to file their motion to stay under seal so that no potentially identifying information is made part of the public record.

WHEREFORE, Defendants respectfully request that this Court enter an order granting leave for Defendants to file their motion to stay and any supporting exhibits under seal.

Respectfully submitted this 9th day of March, 2022.

/s/ Sara M. Turner  
Sara M. Turner  
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**CERTIFICATE OF SERVICE**

I hereby certify on this 9th day of March, 2022, this document was filed through the Electronic Case Filing System of the United States District Court for the Northern District of Alabama and will be served electronically by the court to all participants of record.

/s/ Sara M. Turner  
*Sara M. Turner*